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*Attorneys for Defendant*

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**IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF UTAH**

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**CHG COMPANIES, INC. d/b/a**

**COMPHEALTH,**

Plaintiff,

v.

**SA HOSPITAL ACQUISITION  
GROUP d/b/a SOUTH CITY  
HOSPITAL,**

Defendant.

**DEFENDANT'S ANSWER TO  
COMPLAINT**

Civil No.: 2:22-cv-450 RJS

Judge Robert J. Shelby

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Defendant SA Hospital Acquisition Group d/b/a South City Hospital ("Defendant") submits the following Answer to Plaintiff CHG Companies, Inc. d/b/a Comphealth's Complaint.

Except as otherwise expressly admitted elsewhere in this Answer, Defendant denies the allegations contained in the headings, numbered paragraphs and unnumbered paragraphs of the Complaint.

1. Defendant is without sufficient information or knowledge to admit or deny the

allegations set forth in Paragraph 1.

2. Defendant admits the allegations set forth in Paragraph 2.

3. Defendant admits the allegations set forth in Paragraph 3.

4. Defendant admits the allegations set forth in Paragraph 4.

5. Defendant admits the allegations set forth in Paragraph 5.

6. Defendant admits the allegations set forth in Paragraph 6.

7. Defendant admits the allegations set forth in Paragraph 7.

8. Defendant admits the allegations set forth in Paragraph 8.

9. Defendant is without sufficient information or knowledge to admit or deny the allegations set forth in Paragraph 9.

10. Defendant is without sufficient information or knowledge to admit or deny the allegations set forth in Paragraph 10.

11. Defendant denies each and every allegation set forth in Paragraph 11.

12. Defendant denies each and every allegation set forth in Paragraph 12.

13. Defendant denies each and every allegation set forth in Paragraph 13.

14. Defendant denies each and every allegation set forth in Paragraph 14.

15. Defendant denies each and every allegation set forth in Paragraph 15.

**FIRST CAUSE OF ACTION**  
**(Breach of Contract)**

16. Defendant restates and reincorporates its answers to the preceding paragraphs as fully set forth herein.

17. Defendant denies each and every allegation set forth in Paragraph 17.

18. Defendant denies each and every allegation set forth in Paragraph 18.

19. Defendant denies each and every allegation set forth in Paragraph 19.

20. Defendant denies each and every allegation set forth in Paragraph 20.

**SECOND CAUSE OF ACTION**  
**(Breach of Good Faith and Fair Dealing)**

21. Defendant restates and reincorporates its answers to the preceding paragraphs as fully set forth herein.

22. Defendant denies each and every allegation set forth in Paragraph 22.

23. Defendant denies each and every allegation set forth in Paragraph 23.

24. Defendant denies each and every allegation set forth in Paragraph 24.

WHEREFORE, Defendant SA Hospital Acquisition Group d/b/a South City Hospital, having fully answered Plaintiff CHG Companies, Inc. d/b/a Comphealth's Complaint, respectfully requests that this Court enter judgment in its favor and against Plaintiff CHG Companies, Inc. d/b/a Comphealth, for costs of this action including reasonable attorney fees and for such other and further relief as this court deems just and proper.

Dated this 8<sup>th</sup> day of August, 2022.

/s/ Mayer S. Klein

Mayer S. Klein (*pro hac vice*)  
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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> day of August, 2022, I sent a copy of the foregoing to the following person(s) as indicated below.

Attorneys for Plaintiff:

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- ☐ U.S. Mail
- ☐ Overnight Mail
- ☐ Hand Delivery
- ☐ Electronic Mail
- ☒ Electronic Service via E-Filing

/s/ Mayer S. Klein